

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ANAS ELHADY, et al.,)	
)	
Plaintiffs,)	Case No. 16-cv-00375
)	Hon. Anthony J. Trenga
)	Hon. Mag. John F. Anderson
)	
v.)	
)	
CHARLES H. KABLE , Director of the)	
Terrorist Screening Center; in his official)	
capacity, <i>et al.</i> ;)	
)	
Defendants.)	

**PLAINTIFFS' MOTION TO COMPEL COMPLIANCE WITH COURT ORDER RE: PRIVATE
DISSEMINATION**

Pursuant to Fed R. Civ. P 37(a)(3)(B) and E.D. Va. L.R. 37, Plaintiffs hereby move to compel compliance with Judge Anderson's February 22, 2019 order regarding Defendants' provision of supplemental private dissemination information to Plaintiffs, including specific information about specific private entities. Because the Court required specific private dissemination information to be provided Attorneys Eyes Only, Plaintiffs' supporting papers for this relief are being filed under seal.

Please note that this motion is being filed pursuant to March 5, 2019 instructions from the Clerk's Office to re-file Dkts. 278-281. The re-filing is necessitated by technical difficulties with counsel's CM/ECF log-in, which currently prevents him from using the "Sealed Motion" event. Counsel for Defendants has consented to this Motion to Compel document being filed publicly. The undersigned counsel represents that the supporting documents being filed are substantively identical to those filed at Dkts. 278-281, with changes to only the dates and other minor clarifying edits.

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS

BY: /s/ Gadeir Abbas
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**Gadeir Abbas is licensed in VA, not in D.C. Practice
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Dated: March 5, 2019

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2019, I electronically filed the foregoing by using the Court's ECF system, and that all counsel in the case will receive service through the ECF system. I further certify that all counsel in the case will receive electronic copies of the sealed documents related to this motion.

Respectfully submitted,

COUNCIL ON AMERICAN-ISLAMIC
RELATIONS

/s/ Gadeir I. Abbas